

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:18cr04
)	
RICHARD WINCE,)	
)	
<i>Defendant.</i>)	

MOTION PURSUANT TO U.S.S.G. § 3E1.1(b)

The United States of America, through its attorneys, Tracy Doherty-McCormick, Acting United States Attorney for the Eastern District of Virginia, Peter S. Duffey, Assistant United States Attorney, moves this Court pursuant to U.S.S.G. § 3E1.1(b) to grant an additional one-level reduction in the defendant's offense level for acceptance of responsibility. The Government states that the defendant has assisted authorities in the investigation and prosecution of his own misconduct by timely notifying the United States of the defendant's intention to enter a plea of guilty, thereby permitting the United States to avoid preparing for trial and permitting the United States and the Court to allocate their resources efficiently.

Respectfully submitted,

TRACY DOHERTY-MCCORMICK
ACTING UNITED STATES ATTORNEY

/s/
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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all parties of record.

_____/s/_____
Peter S. Duffey
Assistant United States Attorney